

REMARKS

In each of the rejections under 35 U.S.C. §103(a), the examiner applied DENSHAM (U.S. Appln. No. 2004/0075418) as a secondary reference to meet the limitations recited in the claims. As a continuation application, the earliest possible effective date of DENSHAM is *September 21, 2001* through its parent application (Serial No. 09/960,453).

In the present application, however, applicants claim priority based on EPO Application No. 01102210.0 filed *January 31, 2001*. See attached the declaration of the inventors.

Because DENSHAM was filed nine months after applicants' claimed priority date, it is not a valid reference under the patent laws of the United States. Thus, reconsideration and withdrawal of the rejection is respectfully requested.

Respectfully submitted,

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